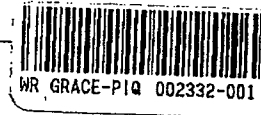


Exhibit I

W. R. Grace Asbestos Personal Injury Questionnaire



RE:
Goldberg, Persky & White, P.C.
4800 Fashion Square Boulevard
Suite 260
Saginaw, MI 48604-2602

REDACTED

REC'D JAN 16 2006



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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE



In re:) Chapter 11
)
W. R. GRACE & CO., et al.,) Case No. 01-01139 (JKF)
) Jointly Administered
Debtors.)
)

W. R. Grace Asbestos Personal Injury Questionnaire

YOU HAVE RECEIVED THIS QUESTIONNAIRE BECAUSE GRACE BELIEVES THAT YOU HAD SUED ONE OR MORE OF THE DEBTORS LISTED IN APPENDIX A ATTACHED TO THIS QUESTIONNAIRE BEFORE GRACE FILED FOR BANKRUPTCY ON APRIL 2, 2001 FOR AN ASBESTOS-RELATED PERSONAL INJURY OR WRONGFUL DEATH CLAIM, AND THAT CLAIM WAS NOT FULLY RESOLVED.

IF YOU HAVE SUCH A CLAIM, YOU MUST COMPLETE AND SUBMIT THIS QUESTIONNAIRE BY JANUARY 12, 2006 TO RUST CONSULTING, INC., THE CLAIMS PROCESSING AGENT, AT ONE OF THE FOLLOWING ADDRESSES:

IF SENT BY U.S. MAIL

RUST CONSULTING, INC.
CLAIMS PROCESSING AGENT
RE: W.R. GRACE & CO. BANKRUPTCY
P.O. BOX 1620
FARIBAULT, MN 55021

IF SENT BY FEDERAL EXPRESS, UNITED PARCEL
SERVICE, OR A SIMILAR HAND DELIVERY SERVICE

RUST CONSULTING, INC.
CLAIMS PROCESSING AGENT
RE: W.R. GRACE & CO. BANKRUPTCY
201 S. LYNDAL AVE.
FARIBAULT, MN 55021

A QUESTIONNAIRE (AND ANY AMENDMENTS OR ADDITIONAL DOCUMENTS IN SUPPORT OF THE QUESTIONNAIRE) WILL NOT BE CONSIDERED UNLESS RECEIVED BY RUST CONSULTING, INC. BY JANUARY 12, 2006.

THIS QUESTIONNAIRE IS AN OFFICIAL DOCUMENT APPROVED BY THE COURT IN CONNECTION WITH ESTIMATING GRACE'S ASBESTOS-RELATED PERSONAL INJURY AND WRONGFUL DEATH CLAIMS AS A WHOLE. THE QUESTIONNAIRE IS BEING USED BY W. R. GRACE AS A MEANS TO SEEK INFORMATION ABOUT YOUR ASBESTOS CLAIM. BY TIMELY RETURNING THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE, GRACE, THE OFFICIAL COMMITTEES, AND THE FUTURE CLAIMANTS REPRESENTATIVE WILL SEEK TO PRIORITIZE THE PROCESSING OF YOUR CLAIM UNDER ANY TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION.

THE COURT HAS ORDERED THAT, AS PART OF THE DISCOVERY PROCESS, ALL HOLDERS OF PRE-PETITION ASBESTOS PERSONAL INJURY CLAIMS MUST COMPLETE AND RETURN THIS QUESTIONNAIRE. THUS, FAILURE TO TIMELY RETURN THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE MAY RESULT IN SANCTIONS AND/OR OTHER RELIEF AVAILABLE UNDER APPLICABLE FEDERAL RULES.

BECAUSE YOUR CLAIM WILL BE EVALUATED IN ACCORDANCE WITH THE TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION, COMPLETION OF THIS QUESTIONNAIRE DOES NOT MEAN THAT YOUR CLAIM WILL EITHER BE ALLOWED OR PAID. TO THE EXTENT YOU ATTACH TO THIS QUESTIONNAIRE DOCUMENTS ALSO NEEDED BY THE TRUST TO PROCESS YOUR CLAIM, SUCH DOCUMENTS WILL BE PROVIDED TO THE TRUST AND YOU WILL NOT NEED TO RESUBMIT THEM.



INSTRUCTIONS

A. GENERAL

1. This Questionnaire refers to any lawsuit that you filed before April 2, 2001 for an "asbestos-related personal injury or wrongful death claim." This term is intended to cover any lawsuit alleging any claim for personal injuries or damages that relates to: (a) exposure to any products or materials containing asbestos that were manufactured, sold, supplied, produced, specified, selected, distributed or in any way marketed by one or more of the Debtors (or any of their respective past or present affiliates, or any of the predecessors of any of the Debtors or any of their respective past or present affiliates), or (b) exposure to vermiculite mined, milled or processed by the Debtors (or any of their respective past or present affiliates, or any of the predecessors of any of the Debtors or any of their predecessors' respective past or present affiliates). It includes claims in the nature of or sounding in tort, or under contract, warranty, guarantee, contribution, joint and several liability, subrogation, reimbursement, or indemnity, or any other theory of law or equity, or admiralty for, relating to, or arising out of, resulting from, or attributable to, directly or indirectly, death, bodily injury, sickness, disease, or other personal injuries or other damages caused, or allegedly caused, directly or indirectly, and arising or allegedly arising, directly or indirectly, from acts or omissions of one or more of the Debtors. It includes all such claims, debts, obligations or liabilities for compensatory damages such as loss of consortium, personal or bodily injury (whether physical, emotional or otherwise), wrongful death, survivorship, proximate, consequential, general, special, and punitive damages.
2. Your Questionnaire will be deemed filed only when it has been received by Rust Consulting Inc., the Claims Processing Agent, via U.S. Mail, Federal Express, United Parcel Service or a similar hand delivery service. A Questionnaire that is submitted by facsimile, telecopy or other electronic transmission will not be accepted and will not be deemed filed.

Do not send any Questionnaire to the Debtors, counsel for the Debtors, the Future Claimants Representative, the Official Committee of Unsecured Creditors, the Official Committee of Asbestos Personal Injury Claimants, the Official Committee of Asbestos Property Damage Claimants, the Official Committee of Equity Security Holders, or such Committees' counsel. Questionnaires that are filed with or sent to anyone other than Rust Consulting, Inc. will be deemed not to have been submitted, and such Questionnaires will not be considered.
3. Your completed Questionnaire must (i) be written in English, and (ii) attach relevant supporting materials as instructed further below.
4. All holders of claims described on page i (and as described in further detail in Instruction A (1) above) are required to file this Questionnaire by Jan. 12, 2006. Your Questionnaire will be used in connection with the estimation hearing to be conducted by the Court pursuant to the Estimation Procedures Order (a copy of which is attached as Appendix B).
5. Any subsequent amendment to the Questionnaire will not be considered for any purpose unless received by Jan. 12, 2006.

B. PART I -- Identity of Injured Person and Legal Counsel

Respond to all applicable questions. If you are represented by a lawyer, then in Part I (b), please provide your lawyer's name and the name, telephone number and address of his/her firm. If you are represented by a lawyer, he/she must assist in the completion of this Questionnaire. Also, if you would prefer that the Debtors send any additional materials only to your lawyer, instead of sending such materials to you, then check the box indicating this in Part I (b).

All references to "you" or the like in Parts I through X shall mean the injured person. If the injured person is deceased, then the executor of the person's will (or similar estate representative) must complete this Questionnaire.

C. PART II -- Asbestos-Related Condition(s)

Please indicate all asbestos-related medical conditions for which you have been diagnosed. To complete questions related to injuries, medical diagnoses, and/or conditions, please use the following categories of customarily diagnosed conditions:

- Mesothelioma
- Asbestos-Related Lung Cancer
- Other Cancer (colon, laryngeal, esophageal, pharyngeal, or stomach)
- Clinically Severe Asbestosis
- Asbestosis
- Other Asbestos Disease

If you have been diagnosed with multiple conditions and/or if you received diagnoses and diagnostic tests relating to the same condition by multiple doctors, please complete a separate Part II for each initial diagnosis and any previous or subsequent diagnoses or diagnostic tests that change or conflict with the initial diagnosis. For your convenience, additional copies of Part II are attached as Appendix C to this Questionnaire.

Supporting Documents for Diagnosis: This Questionnaire must be accompanied by copies, with access to originals upon request, of any and all documents you, your counsel, or your doctors have or subsequently obtain that support or conflict with your diagnosis.

X-rays and B-reads: Please attach all x-ray readings and reports. You may, but are not required to, attach chest x-rays. The court, however, has ruled that Grace may seek access to chest x-rays upon request.

Pulmonary Function Tests: Please attach all pulmonary function test results, including the actual raw data and all spirometric tracings, on which the results are based.



WR GRACE-PIQ 002332-005

D. PART III – Direct Exposure to Grace Asbestos-Containing Products

In Part III, please provide the requested information for the job and site at which you were exposed to Grace asbestos-containing products. Indicate the dates of exposure to each Grace asbestos-containing product. If your exposure was a result of your employment, use the list of occupation and industry codes below to indicate your occupation and the industry in which you worked at each site. If you allege exposure to Grace asbestos-containing products at multiple sites, the Court has ordered that you must complete a separate Part III for each site. For your convenience, additional copies of Part III are attached as Appendix D to this Questionnaire.

Attach copies of any and all documents establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the disease.

Occupation Codes

- | | |
|--|---|
| 01. Air conditioning and heating installer/maintenance | 31. Iron worker |
| 02. Asbestos miner | 32. Joiner |
| 03. Asbestos plant worker/asbestos manufacturing worker | 33. Laborer |
| 04. Asbestos removal/abatement | 34. Longshoreman |
| 05. Asbestos sprayer/spray gun mechanic | 35. Machinist/machine operator |
| 06. Assembly line/factory/plant worker | 36. Millwright/mill worker |
| 07. Auto mechanic/bodywork/brake repairman | 37. Mixer/bagger |
| 08. Boilermaker | 38. Non-asbestos miner |
| 09. Boiler repairman | 39. Non-occupational/residential |
| 10. Boiler worker/cleaner/inspector/engineer/installer | 40. Painter |
| 11. Building maintenance/building superintendent | 41. Pipefitter |
| 12. Brake manufacturer/installer | 42. Plasterer |
| 13. Brick mason/layer/hod carrier | 43. Plumber - install/repair |
| 14. Burner operator | 44. Power plant operator |
| 15. Carpenter/woodworker/cabinetmaker | 45. Professional (e.g., accountant, architect, physician) |
| 16. Chipper | 46. Railroad worker/carman/brakeman/machinist/conductor |
| 17. Clerical/office worker | 47. Refinery worker |
| 18. Construction - general | 48. Remover/installer of gaskets |
| 19. Custodian/janitor in office/residential building | 49. Rigger/stevedore/seaman |
| 20. Custodian/janitor in plant/manufacturing facility | 50. Rubber/tire worker |
| 21. Electrician/inspector/worker | 51. Sandblaster |
| 22. Engineer | 52. Sheet metal worker/sheet metal mechanic |
| 23. Firefighter | 53. Shipfitter/shipwright/ship builder |
| 24. Fireman | 54. Shipyard worker (md. repair, maintenance) |
| 25. Flooring installer/tile installer/tile mechanic | 55. Steamfitter |
| 26. Foundry worker | 56. Steelworker |
| 27. Furnace worker/repairman/installer | 57. Warehouse worker |
| 28. Glass worker | 58. Welder/blacksmith |
| 29. Heavy equipment operator (includes truck, forklift, & crane) | 59. Other |
| 30. Insulator | |

Industry Codes

- | | |
|--|--|
| 001. Asbestos abatement/removal | 109. Petrochemical |
| 002. Aerospace/aviation | 110. Railroad |
| 100. Asbestos mining | 111. Shipyard-construction/repair |
| 101. Automotive | 112. Textile |
| 102. Chemical | 113. Tire/rubber |
| 103. Construction trades | 114. U.S. Navy |
| 104. Iron/steel | 115. Utilities |
| 105. Longshore | 116. Grace asbestos manufacture or milling |
| 106. Maritime | 117. Non-Grace asbestos manufacture or milling |
| 107. Military (other than U.S. Navy) | 118. Other |
| 108. Non-asbestos products manufacturing | |



E. PART IV -- Indirect Exposure to Grace Asbestos-Containing Products

In Part IV, please provide the information requested for any injury alleged to have been caused by exposure to Grace asbestos-containing products through contact/proximity with another injured person. If you allege exposure through contact/proximity with multiple injured persons, please complete a separate Part IV for each injured person. For your convenience, additional copies of Part IV are attached as Appendix E to this Questionnaire.

F. PART V -- Exposure to Non-Grace Asbestos-Containing Products

In Part V, please provide the requested information for each party against which you have filed a lawsuit and/or claim alleging exposure to asbestos-containing products other than Grace products. If you filed such lawsuits and/or claims against multiple parties, the Court has ordered that you must complete a separate Part V for each party. If exposure was in connection with your employment, use the list of occupation and industry codes in Part III to indicate your occupation and the industry in which you worked. For your convenience, additional copies of Part V are attached as Appendix F to this Questionnaire.

G. PART VI -- Employment History

In Part VI, please provide the information requested for each industrial job you have held, other than jobs already listed in Parts III or V. Use the list of occupation and industry codes in the instructions to Part III to indicate your occupation and the industry in which you worked for each job. Please use the copy of Part VI attached as Appendix G to this Questionnaire if additional space is needed.

H. PART VII -- Litigation and Claims Regarding Asbestos and/or Silica

In Part VII, please describe any lawsuits and/or claims that were filed by you or on your behalf regarding asbestos or silica.

I. PART VIII -- Claims by Dependents or Related Persons

Part VIII is to be completed only by dependents or related persons (such as spouse or child) of an injured person who sued the Debtors before April 2, 2001 for an asbestos-related personal injury or wrongful death claim against Grace not involving physical injury to him-/herself on account of his/her own exposure. One example of such a claim would be a claim for loss of consortium. If you are asserting such a claim, complete the entire Questionnaire, providing all information and documentation regarding the injured person.

J. PART IX -- Supporting Documentation

In Part IX, please mark the boxes next to each type of document that you are submitting with this Questionnaire. As indicated in the instructions to Parts II and III, this Questionnaire must be accompanied by copies, with access to originals upon request, of any and all documents you, your counsel, or your doctors have or subsequently obtain that (a) support or conflict with your diagnosis and/or (b) establish exposure to Grace asbestos-containing products as having a substantial causal role in the development of the medical diagnoses, and/or conditions claimed. Original documents provided to Grace will be returned within a reasonable time after its professionals and experts have reviewed the documents.

Grace will reimburse your reasonable expenses incurred in providing (a) copies of depositions you have given in lawsuits in which Grace was not a party and/or (b) any documents you have previously provided to Grace in prior litigation. Please indicate the documents for which you are seeking reimbursement and attach a receipt for such cost.

K. PART X -- Attestation that Information is True, Accurate and Complete

By signing Part X, you, the injured person, are attesting and swearing, under penalty of perjury, that, to the best of your knowledge, all of the information in this Questionnaire is true, accurate and complete. If the injured person is deceased, then the executor of the person's will (or similar estate representative) must complete and sign Part X on behalf of the injured person.

The legal representative of the injured person must complete and sign Part X where indicated.

a. GENERAL INFORMATION

1. Name of Claimant: _____ 2. Gender: ☒ Male ☐ Female
First MI Last

3. Race (for purposes of evaluating Pulmonary Function Test results): _____ ☐ White/Caucasian
☐ African American
☐ Other

4. Last Four Digits of Social Security Number: REDACTED 5. Birth Date: _____

6. Mailing Address: _____
Address City State/Province Zip/Postal Code

7. Daytime Telephone Number: _____

1. Name of Lawyer: Lane Clack

2. Name of Law Firm With Which Lawyer is Affiliated: Goldberg, Persky & White, P.C.

3. Mailing Address of Firm: 4800 Fashion Square Boulevard, Suite 260 Saginaw, MI 48604-2602

Address	City	State/Province	Zip/Postal Code
---------	------	----------------	-----------------

4. Law Firm's Telephone Number or Lawyer's Direct Line:..... (989) 799-4848

☒ Check this box if you would like the Debtors to send subsequent material relating to your claim to your lawyer, in lieu of sending such materials to you.

1. Is the injured person living or deceased?: ☒ Living ☐ Deceased
If deceased, date of death: 12:00:00 AM

2. If the injured person is deceased, then attach a copy of the death certification to this Questionnaire and complete the following:

Primary Cause of Death (as stated in the Death Certificate): _____
Contributing Cause of Death (as stated in the Death Certificate): _____



WR GRACE-PIQ 002332-008

PART II: ASBESTOS-RELATED CONDITION(S)

Mark the box next to the conditions with which you have been diagnosed and provide all information required in the instructions to this Questionnaire. If you have been diagnosed with multiple conditions and/or if you received diagnoses and diagnostic tests relating to the same condition by multiple doctors, please complete a separate Part II for each initial diagnosis and any previous or subsequent diagnoses or diagnostic tests that change or conflict with the initial diagnosis. For your convenience, additional copies of Part II are attached as Appendix C to this Questionnaire.

1. Please check the box next to the condition being alleged:

- | | |
|---|--|
| <input type="checkbox"/> Asbestos-Related Lung Cancer | <input checked="" type="checkbox"/> Mesothelioma |
| <input checked="" type="checkbox"/> Asbestosis | <input checked="" type="checkbox"/> Other Cancer (cancer not related to lung cancer or mesothelioma) |
| <input type="checkbox"/> Other Asbestos Disease | <input type="checkbox"/> Clinically Severe Asbestosis |

a. Mesothelioma: If alleging Mesothelioma, were you diagnosed with malignant mesothelioma based on the following (check all that apply):

- ☐ diagnosis from a pathologist certified by the American Board of Pathology
- ☐ diagnosis from a second pathologist certified by the American Board of Pathology
- ☐ diagnosis and documentation supporting exposure to Grace asbestos-containing products having a substantial causal role in the development of the condition
- ☐ other (please specify): _____

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)



b. **Asbestos-Related Lung Cancer:** If alleging Asbestos-Related Lung Cancer, were you diagnosed with primary lung cancer based on the following (check all that apply):

- ☐ findings by a pathologist certified by the American Board of Pathology
- ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestosis determined by pathology
- ☐ evidence of asbestos-related nonmalignant disease based on a chest x-ray reading of at least 1/0 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestos-related nonmalignant disease based on a chest x-ray reading of at least 1/0 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
- ☐ diffuse pleural thickening as defined in the International Labour Organization's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the lung cancer
- ☐ other (please specify): _____

c. **Other Cancer:**

(i) If alleging Other Cancer, please mark the box(es) next to the applicable primary cancer(s) being alleged:

- ☒ colon ☐ pharyngeal ☐ esophageal ☐ laryngeal ☐ stomach cancer
☐ other, please specify: _____

(ii) Were you diagnosed with the above-indicated cancer based on the following (check all that apply):

- ☒ findings by a pathologist certified by the American Board of Pathology
- ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
- ☐ evidence of asbestosis determined by pathology
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the cancer
- ☐ other (please specify): _____

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)



d. **Clinically Severe Asbestosis:** If alleging Clinically Severe Asbestosis, was your diagnosis based on the following (check all that apply):

- ☐ diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
- ☐ a chest x-ray reading of at least 2/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
- ☐ a chest x-ray reading of at least 2/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
- ☐ asbestosis determined by pathology
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating total lung capacity less than 65% predicted
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating forced vital capacity less than 65% predicted and a FEV1/FVC ratio greater than or equal to 65% predicted
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the asbestosis
- ☐ other (please specify): _____

e. **Asbestosis:** If alleging Asbestosis, was your diagnosis based on the following (check all that apply):

- ☐ diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* by a B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* by a second B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ asbestosis determined by pathology
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating a FEV1/FVC ratio greater than or equal to 65% predicted with either (a) total lung capacity less than 80% predicted or (b) forced vital capacity less than 80% predicted
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the asbestosis
- ☐ other (please specify): _____

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

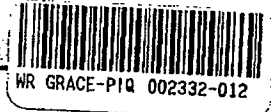


f. Other Asbestos Disease: If alleging any asbestos-related injuries, medical diagnoses, and/or conditions other than those above, was your diagnosis based on the following (check all that apply):

- ☐ diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
- ☐ diagnosis determined by pathology
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 *International Classification of Radiographs of Pneumoconioses* by a B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 *International Classification of Radiographs of Pneumoconioses* by a second B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a chest x-ray reading other than those described above
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing: Selection of Reference Values and Interpretive Strategies*, demonstrating a FEV1/FVC ratio greater than or equal to 65% predicted with either (a) total lung capacity less than 80% predicted or (b) forced vital capacity less than 80% predicted
- ☐ a pulmonary function test other than that discussed above
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the condition
- ☐ a CT Scan or similar testing
- ☐ a diagnosis other than those above
- ☐ other (please specify): _____

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PART II: ASBESTOS-RELATED CONDITION(S) (Continued)



2. Information Regarding Diagnosis

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Claimant also objects because it would be unduly burdensome to require claimant to reproduce the information in summary fashion which is readily contained in the attached medical reports. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

Date of Diagnosis: 5/1/1994

Diagnosing Doctor's Name: Verjuss

Diagnosing Doctor's Specialty: Pathologist Surgeon

Diagnosing Doctor's Mailing Address: Pennock Hospital
AddressHastings
CityMI
State/Province

Zip/Postal Code

Diagnosing Doctor's Daytime Telephone Number: () - -

With respect to your relationship to the diagnosing doctor, check all applicable boxes:

Was the diagnosing doctor your personal physician? ☒ Yes ☐ No

Claimant objects to the term "personal physician" for the reason that it is vague. Without waiving the objection, claimant interprets "personal" to mean a physician who reviewed information personal to claimant, and claimant asserts that the physicians who found asbestos-related disease in claimant reviewed personal information concerning claimant. Claimant has attached copies of medical reports and records, and claimant refers WR Grace to such records to determine the nature of the relationship

Was the diagnosing doctor paid for the diagnostic services that he/she performed? ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received

Did you retain counsel in order to receive any of the services performed by the diagnosing doctor? ☐ Yes ☐ No

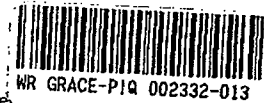
Claimant objects for the reason that information concerning the attorney/client relationship is privileged.

Was the diagnosing doctor referred to you by counsel? ☐ Yes ☒ No

See the attached medical reports and records.

Are you aware of any relationship between the diagnosing doctor and your legal counsel? ☐ Yes ☒ No

If yes, please explain:



- Claimant objects for the reason that the identity of the medical doctors is disclosed in the attached medical records and claimant refers WR Grace to such records. WR Grace has equal accessibility to the national registries which list board certifications for medical providers. Claimant is informed and believes that medical providers consulted by claimant's counsel are board certified in their appropriate fields. Claimant does not have personal knowledge concerning medical providers not consulted by counsel, but assumes this knowledge is accessible to WR Grace from the appropriate certification entities.

Claimant refers WR Grace to the attached medical reports or records to determine if the medical doctor performed a physical examination. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial.

Was the diagnosing doctor certified as a pulmonologist or internist by the American Board of Internal Medicine at the time of the diagnosis? ☐ Yes ☒ No

See attached medical records and reports

Was the diagnosing doctor certified as a pathologist by the American Board of Pathology at the time of the diagnosis? ☒ Yes ☐ No

See attached medical records and reports

Was the diagnosing doctor provided with your complete occupational, medical and smoking history prior to diagnosis? ☒ Yes ☐ No

See attached medical records and reports

Did the diagnosing doctor perform a physical examination? ☒ Yes ☐ No

See attached medical records and reports

Do you currently use tobacco products? ☐ Yes ☒ No

Have you ever used tobacco products? ☒ Yes ☐ No

If answer to either question is yes, please indicate whether you have regularly used any of the following tobacco products and the dates and frequency with which such products were used:

- ☒ Cigarettes Packs Per Day (half pack = .5) 5 Start Year 1930 End Year 1991
- ☐ Cigars Cigars Per Day _____ Start Year _____ End Year _____
- ☐ If Other Tobacco Products, please specify (e.g., chewing tobacco): _____

Amount Per Day _____ Start Year _____ End Year _____

Have you ever been diagnosed with chronic obstructive pulmonary disease ("COPD")? ☐ Yes ☒ No

If yes, please attach all documents regarding such diagnosis and explain the nature of the diagnosis:

3. Information Regarding Chest X-Ray

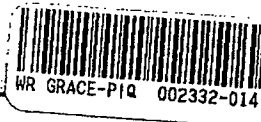
Claimant objects for the reason that claimant it is unclear what "your chest x-ray" refers to. In response to the question and without waiving the objection, claimant refers WR Grace to the attached medical records and reports.

Please check the box next to the applicable location where your chest x-ray was taken (check one):

☐ Mobile laboratory ☐ Job site ☐ Union Hall ☐ Doctor office ☐ Hospital ☐ Other: _____

Address where chest x-ray taken: _____
Address

City _____ State/Province _____ Zip/Postal Code _____

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)**4. Information Regarding Chest X-Ray Reading**

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Additionally, it would be unduly burdensome to require that claimant's reproduce in summary form the evidence which is readily obtainable from the attached records. The information requested is contained to the extent available in the attached medical records and reports

Date of Reading: ____ / ____ / ____ ILO score: ____

Name of Reader: _____

Reader's Daytime Telephone Number: _____ (____) ____ - ____

Reader's Mailing Address: _____
Address

City _____ State/Province _____ Zip/Postal Code _____

With respect to your relationship to the reader, check all applicable boxes:

Was the reader paid for the services that he/she performed ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received

Did you retain counsel in order to receive any of the services performed by the reader? ☐ Yes ☐ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged

Was the reader referred to you by counsel? ☐ Yes ☐ No

See the attached medical reports and records.

Are you aware of any relationship between the reader and your legal counsel? ☐ Yes ☒ No

If yes, please explain: _____

Was the reader certified by the National Institute for Occupational Safety and Health at the time of the reading? ☐ Yes ☐ No

Claimant objects for the reason the information requested is equally accessible to WR Grace from the attached medical reports and the NIOSH list of certified B readers. Claimant is informed and believes that doctors consulted by counsel who complete ILO forms are generally NIOSH certified readers.

If the reader is not a certified B-reader, please describe the reader's occupation, specialty, and the method through which the reading was made: _____

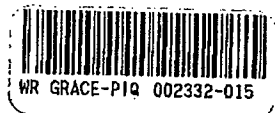
Claimant objects for the reasons stated in the previous question and claimant refers WR Grace to the attached medical records for the information requested.

5. Information Regarding Pulmonary Function Test: _____ Date of Test: ____ / ____ / ____

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Additionally, it would be unduly burdensome to require that claimant's reproduce in summary form the evidence which is readily obtainable from the attached records. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial. See the attached medical records and reports for the information that is available.

List your height in feet and inches when test given: _____ ft _____ inches

List your weight in pounds when test given: _____ lbs



Total Lung Capacity (TLC): % of predicted

Forced Vital Capacity (FVC): % of predicted

FEV1/FVC Ratio: % of predicted

Name of Doctor Performing Test (if applicable):

Doctor's Specialty:

Name of Clinician Performing Test (if applicable):

Testing Doctor or Clinician's Mailing Address:
Address

City State/Province Zip/Postal Code

Testing Doctor or Clinician's Daytime Telephone Number: () -

Name of Doctor Interpreting Test:

Doctor's Specialty:

Interpreting Doctor's Mailing Address:
Address

City State/Province Zip/Postal Code

Interpreting Doctor's Daytime Telephone Number: () -

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)



With respect to your relationship to the doctor or clinician who performed the pulmonary function test check all applicable boxes:

If the test was performed by a doctor, was the doctor your personal physician? ☐ Yes ☐ No

Claimant objects to the term "personal physician" for the reason that it is vague. Without waiving the objection, claimant interprets "personal" to mean a physician who reviewed information personal to claimant, and claimant asserts that the physicians who found asbestos-related disease in claimant reviewed personal information concerning claimant. Claimant has attached copies of medical reports and records, and claimant refers WR Grace to such records to determine the nature of the relationship.

Was the testing doctor and/or clinician paid for the services that he/she performed?..... ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received

Did you retain counsel in order to receive any of the services performed by the testing doctor or clinician?.. ☐ Yes ☐ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged.

Was the testing doctor or clinician referred to you by counsel?..... ☐ Yes ☐ No

See the attached medical reports and records.

Are you aware of any relationship between either the doctor or clinician and your legal counsel?..... ☐ Yes ☒ No

If yes, please explain: _____

Was the testing doctor certified as a pulmonologist or internist by the American Board of Internal Medicine at the time of the pulmonary function test? ☐ Yes ☐ No

Claimant objects for the reason that the identity of the medical doctors is disclosed in the attached medical reports or records and claimant refers WR Grace to such records. WR Grace has equal accessibility to the national registries which list board certifications for medical providers. Claimant is informed and believes that medical providers consulted by claimant's counsel are board certified in their appropriate fields. Claimant does not have personal knowledge concerning medical providers not consulted by counsel, but assumes this knowledge is accessible to WR Grace from the appropriate certification entities.

With respect to your relationship to the doctor interpreting the results of the pulmonary function test check all applicable boxes:

Was the doctor your personal physician? ☒ Yes ☐ No

Claimant objects to the term "personal physician" for the reason that it is vague. Without waiving the objection, claimant interprets "personal" to mean a physician who reviewed information personal to claimant, and claimant asserts that the physicians who found asbestos-related disease in claimant reviewed personal information concerning claimant. Claimant has attached copies of medical reports and records, and claimant refers WR Grace to such records to determine the nature of the relationship.

Was the doctor paid for the services that he/she performed? ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received

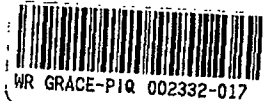
Did you retain counsel in order to receive any of the services performed by the doctor?..... ☐ Yes ☐ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged.

Was the doctor referred to you by counsel? ☐ Yes ☐ No

See the attached medical reports and records.

Are you aware of any relationship between the doctor and your legal counsel?..... ☐ Yes ☒ No



If yes, please explain _____

Was the doctor interpreting the pulmonary function test results certified as a pulmonologist or internist by the American Board of Internal Medicine at the time the test results were reviewed? ☐ Yes ☐ No

Claimant objects for the reason that the identity of the medical doctors is disclosed in the attached medical reports or records and claimant refers WR Grace to such records. WR Grace has equal accessibility to the national registries which list board certifications for medical providers. Claimant is informed and believes that medical providers consulted by claimant's counsel are board certified in their appropriate fields. Claimant does not have personal knowledge concerning medical providers not consulted by counsel, but assumes this knowledge is accessible to WR Grace from the appropriate certification entities.

6. Information Regarding Pathology Reports:

Claimant objects for the reason that the information requested below is equally accessible to WR Grace from the attached medical records and reports and claimant refers WR Grace to the attached medical records and reports. Additionally, it would be unduly burdensome to require that claimant's reproduce in summary form the evidence which is readily obtainable from the attached records. Claimant further objects because this case has not yet been set for trial as to WR Grace and full trial workup as to WR Grace may not yet have been completed. WR Grace's discovery request is therefore untimely under applicable state law and may not reflect the evidence to be adduced against WR Grace at trial. See the attached medical records and reports for information that is available.

Date of Pathology Report: 9/10/1997
 Findings: Abundant Plaque Athero Sclerosis
 Name of Doctor Issuing Report: Jaywant Parmar MD
 Doctor's Specialty: Pathologist
 Doctor's Mailing Address: 953 Northern Rec d
Wheeling WV 26003
 City State/Province Zip/Postal Code
 Doctor's Daytime Telephone Number: (304) 234-1099

With respect to your relationship to the doctor issuing the pathology report, check all applicable boxes:

Was the doctor your personal physician? ☒ Yes ☐ No

Claimant objects to the term "personal physician" for the reason that it is vague. Without waiving the objection, claimant interprets "personal" to mean a physician who reviewed information personal to claimant, and claimant asserts that the physicians who found asbestos-related disease in claimant reviewed personal information concerning claimant. Claimant has attached copies of medical reports and records, and claimant refers WR Grace to such records to determine the nature of the relationship.

Was the doctor paid for the services that he/she performed? ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: Claimant has responsibility for payment for all services. If medical consultation was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received.

Did you retain counsel in order to receive any of the services performed by the doctor? ☐ Yes ☐ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged.

Was the doctor referred to you by counsel? ☐ Yes ☐ No

See the attached medical reports and records.

Are you aware of any relationship between the doctor and your legal counsel? ☐ Yes ☒ No

If yes, please explain: _____



Was the doctor certified as a pathologist by the American Board of Pathology at the time of the diagnosis?

☒ Yes ☐ No

Claimant objects for the reason that the identity of the medical doctors is disclosed in the attached medical reports or records and claimant refers WR Grace to such records. WR Grace has equal accessibility to the national registries which list board certifications for medical providers. Claimant is informed and believes that medical providers consulted by claimant's counsel are board certified in their appropriate fields. Claimant does not have personal knowledge concerning medical providers not consulted by counsel, but assumes this knowledge is accessible to WR Grace from the appropriate certification entities.

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)



7. With respect to the condition alleged, have you received medical treatment from a doctor for the condition?

☒ Yes ☐ No

Objection for the reason that it is unclear what is meant by the term "medical treatment". Claimant believes that all work reflected in the attached medical records and reports involves medical treatments. Without waiving the objection, Claimant refers WR Grace to the attached medical reports and records for work performed by the medical doctor.

If yes, please complete the following:

Name of Treating Doctor: Various

Treating Doctor's Specialty: Oncologist Surgeon / General Medicine

Treating Doctor's Mailing Address: Gannock Hospital

Hestings City MI State/Province Zip/Postal Code

Treating Doctor's Daytime Telephone number: () -

Was the doctor paid for the services that he/she performed? ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: Claimant has responsibility for payment for all services. If medical condition was provided in connection with claimant's legal claim, the costs of such services are normally advanced by claimant's law firm and deducted from any settlements received.

Did you retain counsel in order to receive any of the services performed by the doctor? ☐ Yes ☒ No

Claimant objects for the reason that information concerning the attorney-client relationship is privileged.

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PART III: DIRECT EXPOSURE TO GRACE ASBESTOS-CONTAINING PRODUCTS

Claimant objects for the reason that the request is unduly burdensome give the time constraints claimant has to provide the information. For many years prior to WR Grace's bankruptcy, claimant through claimant's counsel had a tolling agreement with WR Grace which prevented litigation and discovery against WR Grace. Claimant is now being requested to produce trial ready evidence without the ability to individually discover evidence against WR Grace concerning specific job sites worked at by claimant and in a time frame that is unrealistically short. In addition, WR Grace historically has resolved claims for exposure at the job sites at issue, and WR Grace has access to the information concerning exposure which has been provided to WR Grace as part of prior administrative settlements. This request is therefore redundant and the information is as readily available to WR Grace as to claimant. Without waiving these objections, see attached for the exposure information currently available to claimant. In addition, claimant refers WR Grace to the Master Product Identification Evidence which has been submitted for all claimants and is incorporated herein by reference.

Please complete the chart below for each site at which you allege exposure to Grace asbestos-containing products. If you allege exposure at multiple sites, the Court has ordered that you must complete a separate chart for each site. For your convenience, additional copies of Part III are attached as Appendix D to this Questionnaire.

If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked. In the "Nature of Exposure" column, for each job listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Grace asbestos-containing products
- (b) A worker who personally removed or cut Grace asbestos-containing products
- (c) A worker who personally installed Grace asbestos-containing products
- (d) A worker at a site where Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (e) A worker in a space where Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (f) If other, please specify.

Site of Exposure:

Site Name: _____

Location: _____

Site Type: ☐ Residence ☐ Business ☐ Site Owner: _____

Employer During Exposure: _____

Unions of which you were a member during your employment: _____

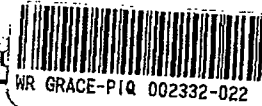
Job 1 Description:	Product(s)	Basis for Identification of Each Grace Product	Dates and Frequency of Exposure (hours/day, days/year)	Occupation Code (If Code 59 specify)	Industry Code (If Code 118 specify)	Was exposure due to working in or around areas where product was being installed, mixed, removed, or cut? If Yes, please indicate your regular proximity to such areas	Nature of Exposure
Commercial Jobs	Zenolite	Co-worker	1949-1972	13	103	Yes close proximity	D
Job 2 Description: Trans State	Zenolite	Co-worker	1960's	13	103	Yes close proximity	D



Job 3 Description: Westbrom	Zenith	Crewker	1960's	13	143	Close proximity	A
Job 4 Description: DauChem	Zenith	Crewker	1969-1970	13	143	Close proximity	D
Job 5 Description: Palisades Nuclear	Zenith	Crewker	1970	13	115	Close proximity	D
Job 6 Description:							
Job 7 Description:							
Job 8 Description:							
Job 9 Description:							
Job 10 Description:							
Job 11 Description:							
Job 12 Description:							
Job 13 Description:							
Job 14 Description:							
Job 15 Description:							
Job 16 Description:							



PART IV: INDIRECT EXPOSURE TO GRACE ASBESTOS-CONTAINING PRODUCTS



1. Are you asserting an injury caused by exposure to Grace asbestos-containing products through contact/proximity with another injured person? ☐ Yes ☒ No

If yes, complete questions 2 through 10 of this section for each injured person through which you allege exposure to Grace asbestos-containing products. For your convenience, additional copies of Part IV are attached as Appendix E to this Questionnaire.

2. Please indicate the following information regarding the other injured person:

Name of Other Injured Person: _____ Gender: ☐ Male ☐ Female

Last Four Digits of Social Security Number: _____ Birth Date: ____ / ____ / ____

3. What is your Relationship to Other Injured Person: ☐ Spouse ☐ Child ☐ Other

4. Nature of Other Injured Person's Exposure to Grace Asbestos-Containing Products:

5. Dates Other Injured Person was Exposed to Grace Asbestos-Containing Products:

From: ____ / ____ / ____ To: ____ / ____ / ____

6. Other Injured Person's Basis for Identification of Asbestos-Containing Product as Grace Product:

7. Has the Other Injured Person filed a lawsuit related to his/her exposure? ☐ Yes ☐ No

If yes, please provide caption, case number, file date, and court name for the lawsuit:

Caption: _____

Case Number: _____ File Date: ____ / ____ / ____

Court Name: _____

8. Nature of Your Own Exposure to Grace Asbestos-Containing Product:

9. Dates of Your Own Exposure to Grace Asbestos-Containing Product:

From: ____ / ____ / ____ To: ____ / ____ / ____

10. Your Basis for Identification of Asbestos-Containing Product as Grace Product:

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PART V: EXPOSURE TO NON-GRACE ASBESTOS-CONTAINING PRODUCTS

Claimant objects for the reason that the request is unduly burdensome and equally accessible to WR Grace as claimant. Claimant is being requested to produce trial ready evidence in an unrealistically short time frame and in a time frame that does not necessarily track the discovery schedules of the underlying tort case. Further, this information is not necessary to determine exposure to a WR Grace product and would be irrelevant in determining whether a prima facie case exists against WR Grace. Additionally, WR Grace has equal access to this information. Without waiving these objections, claimant refers WR Grace to claimant's complaint in the underlying tort case which contains claimant's allegations of exposure and defendants' responses and motions concerning complaint's allegations.

Please complete the chart below for each party against which you have filed a lawsuit and/or claim alleging exposure to asbestos-containing products other than Grace products. If you filed such lawsuits and/or claims against multiple parties, the Court has ordered that you must complete a separate chart for each party. For your convenience, additional copies of Part V are attached as Appendix F to this Questionnaire.

If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked. In the "Nature of Exposure" column, for each product listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Non-Grace asbestos-containing products
 (b) A worker who personally removed or cut Non-Grace asbestos-containing products
 (c) A worker who personally installed Non-Grace asbestos-containing products
 (d) A worker at a site where Non-Grace asbestos-containing products were being installed, mixed, removed or cut by others
 (e) A worker in a space where Non-Grace asbestos-containing products were being installed, mixed, removed or cut by others
 (f) If other, please specify.

Party Against which Lawsuit or Claim was Filed:

Products	Dates and Frequency of Exposure (hours/day, days/year)	Occupation Code (If Code 59, specify)	Industry Code (If Code 18, specify)	Was exposure due to working in or around areas where product was being installed, mixed, removed, or cut? If yes, please indicate your regular proximity to such areas	Nature of Exposure
Site of Exposure 1 Site Name: _____ Address: _____ City and State: _____ Site Owner: _____	Job 1 Description:				
	Job 2 Description:				
	Job 3 Description:				
Site of Exposure 2 Site Name: _____ Address: _____ City and State: _____ Site Owner: _____	Job 1 Description:				
	Job 2 Description:				
	Job 3 Description:				





Site of Exposure 3 Site Name: _____ Address: _____ City and State: _____ Site Owner: _____	Job 1 Description:						
	Job 2 Description:						
	Job 3 Description:						

PART VI: EMPLOYMENT HISTORY



See attached work history.

Other than jobs listed in Part III or V, please complete this Part VI for all of your prior industrial work experience up to and including your current employment. For each job, include your employer, location of employment, and dates of employment. Only include jobs at which you worked for at least one month. Please use the copy of Part VI attached as Appendix G to this Questionnaire if additional space is needed.

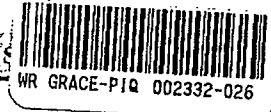
Occupation Code: 13 If Code 59, specify: _____
 Industry Code: 103 If Code 118, specify: _____
 Employer: John B Rossi
 Beginning of Employment: 1/1/1949 End of Employment: 1/1/1972
 Location: Various
 Address: Grand Rapids ; Muskegon ; Holland ; South Haven MI
 City: _____ State/Province: _____ Zip/Postal Code: _____

Occupation Code: B If Code 59, specify: _____
 Industry Code: 103 If Code 118, specify: _____
 Employer: John B Rossi
 Beginning of Employment: 1/1/1960 End of Employment: 1/1/1960
 Location: Jans State University Western Michigan
 Address: University
 City: _____ State/Province: _____ Zip/Postal Code: _____

Occupation Code: 13 If Code 59, specify: _____
 Industry Code: 102 If Code 118, specify: _____
 Employer: John B Rossi
 Beginning of Employment: 1/1/1969 End of Employment: 1/1/1970
 Location: DuChemical Company
 Address: Midland MI
 City: _____ State/Province: _____ Zip/Postal Code: _____

Occupation Code: 13 If Code 59, specify: _____
 Industry Code: 115 If Code 118, specify: _____
 Employer: John B Rossi
 Beginning of Employment: 1/1/1970 End of Employment: 1/1/1970
 Location: Calisceda Nuclear Power
 Address: South Haven MI
 City: _____ State/Province: _____ Zip/Postal Code: _____

PART VII: LITIGATION AND CLAIMS REGARDING ASBESTOS AND/OR SILICA



a. LITIGATION

1. Have you ever been a plaintiff in a lawsuit regarding asbestos or silica? ☒ Yes ☐ No

If yes, please complete the rest of this Part VII(a) for each lawsuit. For your convenience, additional copies of Part VII are attached as Appendix G to this Questionnaire

2. Please provide the caption, case number, file date, and court name for the lawsuit you filed:

Caption:

REDACTED

Case Number:

File Date: 2/27/1997

Court Name: Bay County Circuit Court

3. Was Grace a defendant in the lawsuit? ☒ Yes ☐ No

4. Was the lawsuit dismissed against any defendant? ☐ Yes ☐ No

Claimant objects because this request is unduly burdensome. As WR Grace well-knows, during the course of a lawsuit defendants are dismissed or added as evidence develops. In order to accurately answer this question, claimant would have to review the docket of the entire case which WR Grace can do as readily as claimant.

If yes, please provide the basis for dismissal of the lawsuit against each defendant:

Claimant objects for the reasons stated above

5. Has a judgment or verdict been entered? ☐ Yes ☒ No

Claimant interprets "judgment or verdict" to mean a finding of liability after a trial on the merits of an unliquidated claim. Based upon this understanding the answer is "no".

If yes, please indicate verdict amount for each defendant(s): _____

6. Was a settlement agreement reached in this lawsuit? ☒ Yes ☐ No

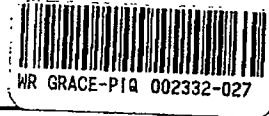
Claimant objects for the reason that such information is confidential and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the disclosure of such settlement information would chill settlement discussions with any remaining defendants. Claimant also objects because such information is not discoverable under controlling state law at this stage of litigation.

If yes and the settlement was reached on or after April 2, 2001, please indicate the following:

- a. Settlement amount for each defendant: _____
 b. Applicable defendants: _____
 c. Disease or condition alleged: _____
 d. Disease or condition settled (if different than disease or condition alleged): _____

7. Were you deposed in this lawsuit? ☒ Yes ☐ No

If yes and Grace was not a party in the lawsuit, please attach a copy of your deposition to this Questionnaire.

b. CLAIMS

1. Have you ever asserted a claim regarding asbestos and/or silica, including but not limited to a claim against an asbestos trust (other than a formal lawsuit in court)? ☒ Yes ☐ No

If yes, please complete the rest of this Part VII(b). If no, please skip to Part VIII.

Claimant objects on the basis that the information requested is confidential and is not reasonably calculated to lead to the discovery of any admissible evidence. In addition, by violating the confidentiality of settlements, disclosure of such information would chill settlement discussions with other defendants. The request is also unduly burdensome. Claimant further objects because the information, if not confidential, would be equally accessible to WR Grace by subpoena. It would be as burdensome for claimant to assemble the information as for WR Grace to do it.

2. Date the claim was submitted: / /
3. Person or entity against whom the claim was submitted:
4. Description of claim:
5. Was claim settled? ☐ Yes ☐ No
6. Please indicate settlement amount: \$
7. Was the claim dismissed or otherwise disallowed or not honored? ☐ Yes ☐ No
- If yes, provide the basis for dismissal of the claim:*

**PART VIII: CLAIMS BY DEPENDENTS OR RELATED PERSONS**

Objection for the reason that the requested information is vague. Claimant is unclear about what is meant by the term "dependents or related persons". Because of this lack of clarity, claimant will answer only with respect to individuals claimed as dependents on IRS income tax returns currently if the asbestos victim is alive or prior to the time of death if the asbestos victim is deceased.

Name of Dependent or Related Person: N Gender: ☐ Male ☐ Female

Last Four Digits of Social Security Number: Birth Date: / /

Financially Dependent: ☐ Yes ☐ No

Relationship to Injured Party: ☐ Spouse ☐ Child ☐ Other If other, please specify

Mailing Address:
Address

City State/Province Zip/Postal Code

Daytime Telephone number: () -

PART IX: SUPPORTING DOCUMENTATION

Please use the checklists below to indicate which documents you are submitting with this form.

Copies:

- | | |
|---|--|
| <input type="checkbox"/> Medical records and/or report containing a diagnosis | <input type="checkbox"/> X-rays |
| <input type="checkbox"/> Lung function test results | <input type="checkbox"/> X-ray reports/interpretations |
| <input type="checkbox"/> Lung function test interpretations | <input type="checkbox"/> CT scans |
| <input checked="" type="checkbox"/> Pathology reports | <input type="checkbox"/> CT scan reports/interpretations |
| <input type="checkbox"/> Supporting documentation of exposure to Grace asbestos-containing products | <input type="checkbox"/> Depositions from lawsuits indicated in Part VII of this Questionnaire |
| <input type="checkbox"/> Supporting documentation of other asbestos exposure | <input type="checkbox"/> Death Certification |

Originals:

- | | |
|---|--|
| <input type="checkbox"/> Medical records and/or report containing a diagnosis | <input type="checkbox"/> Supporting documentation of other asbestos exposure |
| <input type="checkbox"/> Lung function test results | <input type="checkbox"/> X-rays |
| <input type="checkbox"/> Lung function test interpretations | <input type="checkbox"/> X-ray reports/interpretations |
| <input type="checkbox"/> Pathology reports | <input type="checkbox"/> CT scans |
| <input type="checkbox"/> Supporting documentation of exposure to Grace asbestos-containing products | <input type="checkbox"/> CT scan reports/interpretations |
| | <input type="checkbox"/> Death Certification |

Grace will reimburse your reasonable expenses incurred in providing (a) copies of depositions you have given in lawsuits in which Grace was not a party and/or (b) any documents you have previously provided to Grace in prior litigation. Please indicate the documents for which you are seeking reimbursement and attach a receipt for such costs:

PART X: ATTESTATION THAT INFORMATION IS TRUE AND ACCURATE

The information provided in this Questionnaire must be accurate and truthful. This Questionnaire is an official court document that may be used as evidence in any legal proceeding regarding your Claim. The penalty for presenting a fraudulent Questionnaire is a fine of up to \$500,000 or imprisonment for up to five years, or both. 18 U.S.C. §§ 152 & 3571.

TO BE COMPLETED BY THE INJURED PERSON.

I swear, under penalty of perjury, that, to the best of my knowledge, all of the foregoing information contained in this Questionnaire is true, accurate and complete.

Signature: Mildred G. Chase (P.R.)

Date: 1/1/11/06

Please Print Name: _____

TO BE COMPLETED BY THE LEGAL REPRESENTATIVE OF THE INJURED PERSON.

I swear that, to the best of my knowledge, all of the information contained in this Questionnaire is true, accurate and complete.

Signature: Lane Clack

Date: 11/30/2005

Please Print Name: Lane Clack

REDACTED

Goldberg, Persky & White, P.C. - Michigan



Trial Sheet

Client Name: REDACTED Client SSN: Client DOB: Age if Living: 92 Client DOD: Age if Dec: Death Cert. <input type="checkbox"/> LOA <input type="checkbox"/> WDIF <input type="checkbox"/>		Cost/Matter/File: B2598 - 1 - 1435 ClientID: 569 CaseID: 62261 Case Status: SettledBankruptReman Referring Atty: N/A Lien: N/A
Client Status: Single Spouse Name: SS#: DOB: PR Name: SS#: DOB:		Trial Date: 11/25/1997 Jurisdiction: MI: Bay Date of Filing: 2/27/1997 Case#: 97-3160-NP-S Judge: Kenneth W. Schmidt 1st Def: 20th Century Glove Corp. of Texas



REDACTED



Notes:

SSPO: CK Requested Ordered w/BTO Mailed 2/21/1994 5/17/1994 Due Date: Completed: Interrogs: Brochure: Meds: Witness Lists: Deposition: 10/2/1997	Employer: Occupation: Bricklayer Union: Begin Year: 1945 End Year: 1971 Job Sites:
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Primary Disease: Colon CA **Diag. Date:** **Approx.** ☐ **Diag. Dr:**
Secondary Disease: **Diag. Date:** **Diag. Dr:**
ILO:
FVC: **FEV1FVC:** **TLC:** **DLCO:** **FEF2575:** **FEV1:** **FEV3:**
Autopsy Report:

Other Med Reports: Dr. Mintek; Dr. Spindler; Pennock Hospital
 (NOTE, ORIGINALLY WE THOUGHT THIS CASE WAS A MESOTHELIOMA, HOWEVER, IT WAS RULED OUT)

Plaintiff Expert: PARMAR: 1st Report=surgical procedure to remove ptrl plq which is a marker of asbestos exposure & colon cancer. PARMAR
 ADDENDUM REPORT: links colon cancer to asbestosis, diagnosed pathologically & radiologically.

Defense Expert: CRISSMAN: asb.-related ptrl plq. Colon CA not=asb exp. ECHNHRN: ptrl change=asb exp. PRLBRG: 2/1/94 CXR=plr findings
 ?able asb exp.; no prnchym.

Death Certificate:

NonSmoker ☐ **Smoked:** ☐ **Started Smoking:** **Quit Smoking:**
Smoking Notes: Cigarettes, 1/2 PPD from 1930 to 1991.

Goldberg, Persky & White, P.C. - Michigan



Client Name: REDACTED		Cost/Matter/File: B2598 - 1 - 1435	
Client SSN:		ClientID: 569 CaseID: 62261	
Client DOB: Age if Living: 92		Case Status: SettledBankruptReman	
Client DOD: Age if Dec:		Referring Atty: N/A	
Death Cert. <input type="checkbox"/> LOA <input type="checkbox"/> WDIF <input type="checkbox"/>		Lien: N/A	
Client Status: Single		Trial Date: 11/25/1997	
Spouse Name:		Jurisdiction: MI: Bay	
SS#: DOB:		Date of Filing: 2/27/1997	
PR Name:		Case#: 97-3160-NP-S	
SS#: DOB:		Judge: Kenneth W. Schmidt	
		1st Def: 20th Century Glove Corp. of Texas	

☒ REDACTED

☒

Notes:

SSPO:	CK Regsted	Ordered	w/BTO	Mailed	Employer:
		2/21/1994		5/17/1994	Occupation: Bricklayer
	Due Date:	Completed:			Union:
Interrogs:					Begin Year: 1945
Brochure:					End Year: 1971
Meds:					Job Sites:
Witness Lists:					
Deposition:		10/2/1997			

Primary Disease: Colon CA	Diag. Date:	Approx. <input type="checkbox"/>	Diag. Dr:
Secondary Disease:	Diag. Date:		Diag. Dr:
ILO:			
FVC:	FEV1FVC:	TLC:	DLCO:
		FEF2575:	FEV1:
			FEV3:

Autopsy Report:

Other Med Reports: Dr. Mintek; Dr. Spindler; Pennock Hospital
(NOTE, ORIGINALLY WE THOUGHT THIS CASE WAS A MESOTHELIOMA, HOWEVER, IT WAS RULED OUT)

Plaintiff Expert: PARMAR: 1st Report=surgical procedure to remove plrl plq which is a marker of asbestos exposure & colon cancer. PARMAR ADDENDUM REPORT: links colon cancer to asbestosis, diagnosed-pathologically & radiologically.

Defense Expert: CRISSMAN: asb.-related plrl plq. Colon CA not=asb exp. ECHNHRN: plrl change=asb exp. PRLBRG: 2/1/94 CXR=plr findings ?able asb exp.; no prnchymt.

Death Certificate:

NonSmoker ☐ **Smoked:** ☐ **Started Smoking:** **Quit Smoking:**

Smoking Notes: Cigarettes, 1/2 PPD from 1930 to 1991.

Goldberg, Persky & White, P.C. - Michigan



Client Name:

REDACTED

Cost/Matter/File: B2598 - 1 - 1435

PENDING INFORMATION

Initial Contact: 1/18/1994

Union Mailing:

Date Ques to Client:

Date Retainer to Client:

Have CXR No Retainer:

Date CXR to Dr:

Date Open Letter:

Retainer follow-up letter:

Init Contact Follow-up Letter:

PR Follow-up Letter:

Initial Interviewer:

W/DCL 4 CXR appt:

DR Clinic Appt:

Date Retainer Returned:

Date CXR taken:

X-ray Facility Code:

Date Closed Letter:

Letter Type (1/P/C):

CXR follow-up letter:

Responded Init Contact Ltr

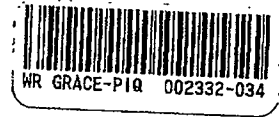


WR Grace - Client Job Summary B2598-1

Client: REDACTED

<i>Approximate Work Years</i>	<i>Job</i>
1960 to 1960	Ferris State University, Big Rapids, MI
1970 to 1970	Consumers Power Palisades Nuclear Power Plant, South Haven, MI
1969 to 1970	Dow Chemical, Midland, MI
1965 to 1965	Western Michigan University, Kalamazoo, MI

WR Grace ClaimID: 000630031665



PLAINTIFF'S DISCOVERY BROCHURE

PLAINTIFF:

REDACTED

OCCUPATION: Tile Setter

EMPLOYER(S): John B. Rossi Company

WORK PLACE(S): Various Commercial and Industrial jobs
throughout the State of Michigan

PERIOD WORKED: 1949-1972

JOB CONDITIONS: Open and enclosed, inside and outside areas.

NATURE OF EXPOSURE TO ASBESTOS: Continuous involvement in (1) the handling and use of asbestos containing insulation, gasketing and packing products; (2) working in cooperation with an in close proximity to co-workers, in-house plant personnel and/or other tradesmen such as Asbestos Insulators, Pipefitters, Bricklayers, Drywall Construction Tradesmen, Boilermakers and Laborers involved in the handling, mixing, fabrication and application of asbestos containing insulation, drywall materials, refractories and castables consisting of pipecovering, block, cements, textiles, gasketing material, sheet asbestos, firebrick and refractory cements; (3) disturbance, deterioration, friability and removal of asbestos products previously installed; (4) shipping, handling and storage of asbestos products; (5) housekeeping of asbestos products; (6) contamination of asbestos dusts in the work place resulting from plant operations and the above existing conditions.



JOB NUMBER: 1
 PERIOD WORKED: 1949-1972
 JOB SITE AND LOCATION: Various commercial jobs including:
 Schools, Churches,
 and Hospitals in the following areas:
 Grand Rapids,
 Muskegon, Holland, South Haven, Grand
 Haven, Wolverine,
 Black Lake, Traverse City, Ludington
 and Cadillac, MI area
 EMPLOYER: John B. Rossi Co.
 LENGTH OF EXPOSURE: Approximately 20 years

Plaintiff's investigation to date has identified the following products as having been used significantly on this job:

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Bond Supply; Alexander Stafford; Acme Insulations; Evert Asbestos; Harrison Piping; Duro Supply; Hi-Temp (Asbestos Specialties)

<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and block	Ruberoid (GAF)
85% Mag pipecovering & block	Armstrong Cork (Armstrong World Industries)
85% Mag pipecovering, block and cements	Johns-Manville
Thermobestos pipecovering and block	Johns-Manville
352 cement	Johns-Manville
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
85% Mag pipecovering, block and cement	Pabco (Fibreboard)
Super 66 cement	Eagle Picher
85% Mag pipecovering, block and cements	Philip Carey
(Celotex/Rapid-	
7M-90 cement	American)
(Celotex/Rapid-	Philip Carey
	American)
Zonolite insulation	W.R. Grace
Insulating cement	A.P. Green

Products:Manufacturers:

Asbestos paper	Grant Wilson
Asbestos rope	Grant Wilson
Insulating cement	Grant Wilson
Insulating cement	M.H. Detrick
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets and packing	Durabla
Asbestos containing gaskets and packing	A.W. Chesterton
Oakum 310 and 310A	Sealite

Initial contacts with witnesses leads Plaintiff to believe that the following witnesses will be able to identify at least the following products. Further, it is anticipated that the following witnesses will also testify relative to the presence of distributors/contractors and/or jobbers as identified above although, unless noted, the witnesses have not been interviewed regarding distributors/jobbers and/or contractors:

REDACTED

Will confirm exposures to those above identified asbestos-containing products.

*Merritt W. Bergklint, 960 Center Street, Muskegon, MI 49442
616-773-3283

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Harrison Piping

Products:Manufacturers:

Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
Zonolite insulation	W.R. Grace
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)

(*) Denotes Plaintiff in an asbestos lawsuit.



Asbestos containing gaskets
and packing
Products:

Garlock
Manufacturers:

Asbestos containing gaskets
and packing
Asbestos containing gaskets
and packing
Asbestos containing gaskets
and packing
Asbestos containing gaskets
and packing
Oakum 310 and 310A

Anchor Packing
Palmetto (Green Tweed)
Durabla
A.W. Chesterton
Sealite

*Alvin W. Malone, 807 Merry Lane Terrace, Greenville, MI 48838
616-754-5459

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Harrison Piping

Products:

Manufacturers:

Kaylo pipecovering and block
Kaylo pipecovering and block
85% Mag pipecovering & block

85% Mag pipecovering, block
and cements
85% Mag pipecovering, block
and cements
(Celotex/Rapid-

7M-90 cement
(Celotex/Rapid-

Owens-Illinois
Owens-Corning Fiberglas
Armstrong Cork (Armstrong
World Industries)

Johns-Manville

Philip Carey

American)
Philip Carey

American)
W.R. Grace
A.P. Green
U.S. Gypsum
Gold Bond (National Gypsum)

Zonolite insulation
Insulating cement
Joint compounds
Joint compounds
Asbestos containing gaskets
and packing
Asbestos containing gaskets
and packing
Asbestos containing gaskets
and packing

Garlock
Anchor Packing
Palmetto (Green Tweed)

(*) Denotes Plaintiff in an asbestos lawsuit.



Asbestos containing gaskets and packing	Durabla
Asbestos containing gaskets and packing	A.W. Chesterton
Oakum 310 and 310A	Sealite

*John Westerhof, 5139 Marlowe, Kentwood, MI 49548 616-534-2247

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
85% Mag pipecovering & block	Armstrong Cork (Armstrong World Industries)
85% Mag pipecovering, block and cements	Johns-Manville
85% Mag pipecovering, block and cements	Philip Carey
(Celotex/Rapid-	
Zonolite insulation	American)
Insulating cement	W.R. Grace
Asbestos rope	A.P. Green
Joint compounds	Grant Wilson
Joint compounds	U.S. Gypsum
Asbestos containing gaskets and packing	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets and packing	Durabla
Asbestos containing gaskets and packing	A.W. Chesterton
Oakum 310 and 310A	Sealite

*Daniel H. Bergeron, 4710 Wheat Drive, Lowell, MI 49331 (616) 897-5891

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Bond Supply; Harrison Piping; Asbestos Specialties
(Hi-Temp Products); Duro Supply

Products:

Manufacturers:

(*) Denotes Plaintiff in an asbestos lawsuit.



Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos rope	Grant Wilson
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
<u>Products:</u>	<u>Manufacturers:</u>

Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets and packing	Durabla
Oakum 310 and 310A	Sealite

*Garth E. Crump, 1862 Rondo S.E., Kentwood, MI 49508 (616) 455-9544

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Bond Supply; Harrison Piping; Asbestos Specialties
(Hi-Temp Products)

<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos rope	Grant Wilson
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets and packing	Durabla
Oakum 310 and 310A	Sealite

*Garold E. Myers, 1121 South Lake Reedy Boulevard, Frostproof,
FL 33843 (813) 635-3579

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,

(*) Denotes Plaintiff in an asbestos lawsuit.



PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Bond Supply; Harrison Piping; Asbestos Specialties (Hi-Temp Products)

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos rope	Grant Wilson
Joint compounds	U.S. Gypsum

Products:

Manufacturers:

Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets and packing	Durabla
Oakum 310 and 310A	Sealite

*Bernard McWilliams, 1988 4 Mile Road, N.W., Garnd Rapids, MI 49507 (616) 784-0537

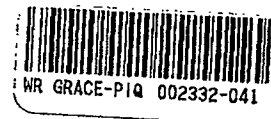
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and block	Ruberoid (GAF)
85% Mag pipecovering & block	Armstrong Cork (Armstrong World Industries)
85% Mag pipecovering, block and cements	Johns-Manville
Thermobestos pipecovering and block	Johns-Manville
352 cement	Johns-Manville
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
85% Mag pipecovering, block	

(*) Denotes Plaintiff in an asbestos lawsuit.



and cement	Pabco (Fibreboard)	
Super 66 cement	Eagle Picher	
85% Mag pipecovering, block		
and cements	Philip	Carey
(Celotex/Rapid-		
	American)	
7M-90 cement	Philip	Carey
(Celotex/Rapid-		
	American)	
Zonolite insulation	W.R. Grace	

(*) Denotes Plaintiff in an asbestos lawsuit.

Products:Manufacturers:

Insulating cement
 Insulating cement
 Joint compounds
 Joint compounds

A.P. Green
 M.H. Detrick
 U.S. Gypsum
 Gold Bond (National Gypsum)

*Willis McWilliams, 1922 4 Mile Road, N.W., Grand Rapids, MI
 48504 (616) 784-0536

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

Products:Manufacturers:

Kaylo pipecovering and block	Owens-Illinois	
Kaylo pipecovering and block	Owens-Corning Fiberglas	
Calsilite pipecovering and block	Ruberoid (GAF)	
85% Mag pipecovering & block	Armstrong Cork (Armstrong World Industries)	
85% Mag pipecovering, block and cements	Johns-Manville	
Thermobestos pipecovering and block	Johns-Manville	
352 cement	Johns-Manville	
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)	
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)	
85% Mag pipecovering, block and cement	Pabco (Fibreboard)	
Super 66 cement	Eagle Picher	
85% Mag pipecovering, block and cements	Philip	Carey
(Celotex/Rapid-	American)	
7M-90 cement	Philip	Carey
(Celotex/Rapid-	American)	
Zonolite insulation	W.R. Grace	
Insulating cement	A.P. Green	
Insulating cement	M.H. Detrick	
Joint compounds	U.S. Gypsum	
Joint compounds	Gold Bond (National Gypsum)	

(*) Denotes Plaintiff in an asbestos lawsuit.



(*) Denotes Plaintiff in an asbestos lawsuit.



Richard Hodapp, 61 North Crooked Lake Road, Kalamazoo, MI 49007

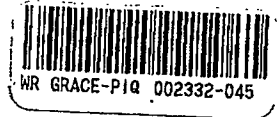
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FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Illinois	
Kaylo pipecovering and block	Owens-Corning Fiberglas	
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85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)	
85% Mag pipecovering, block and cement	Pabco (Fibreboard)	
Super 66 cement	Eagle Picher	
85% Mag pipecovering, block and cements	Philip	Carey
(Celotex/Rapid-	American)	
7M-90 cement	Philip	Carey
(Celotex/Rapid-	American)	
Zonolite insulation	W.R. Grace	
Insulating cement	A.P. Green	
Insulating cement	M.H. Detrick	
Joint compounds	U.S. Gypsum	
Joint compounds	Gold Bond (National Gypsum)	

(*) Denotes Plaintiff in an asbestos lawsuit.



*Richard Cramer, 4475 Fruitvale Rd., Montague, MI 48437 (616) 843-4845

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
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MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Bond Supply; Alexander Stafford; Acme Insulations;
Evert Asbestos

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
Super 66 cement	Eagle Picher
7M-90 cement	Philip
(Celotex/Rapid-	Carey
Zonolite insulation	American)
Insulating cement	W.R. Grace
Asbestos paper	A.P. Green
Insulating cement	Grant Wilson
Insulating cement	Grant Wilson
Insulating cement	M.H. Detrick

*Anthony Deboer, 1514 Winslow, N.W, Grand Rapids, MI 49504

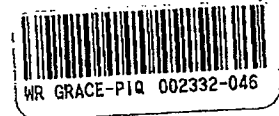
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FURNACES: Bond Supply; Alexander Stafford; Acme Insulations;
Evert Asbestos; Duro Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
Super 66 cement	Eagle Picher
7M-90 cement	Philip
	Carey

(*) Denotes Plaintiff in an asbestos lawsuit.



(Celotex/Rapid-

Zonolite insulation

Products:

Insulating cement

Asbestos paper

Insulating cement

Insulating cement

American)

W.R. Grace

Manufacturers:

A.P. Green

Grant Wilson

Grant Wilson

M.H. Detrick

*Wayne Vugteveen, 511 Lan Kamp, N.W., Grand Rapids, MI 49504
(616) 361-2406

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Bond Supply; Alexander Stafford; Acme Insulations;
Evert Asbestos; Duro Supply

Products:Manufacturers:

Kaylo pipecovering and block

Owens-Corning Fiberglas

Calsilite pipecovering and

block

Ruberoid (GAF)

Thermobestos pipecovering and

block

Johns-Manville

352 cement

Johns-Manville

No. 1 Plus cement

Baldwin-Ehret-Hill (Keene)

Super 66 cement

Eagle Picher

7M-90 cement

Philip

Carey

(Celotex/Rapid-

Zonolite insulation

American)

Insulating cement

W.R. Grace

Asbestos paper

A.P. Green

Insulating cement

Grant Wilson

Insulating cement

Grant Wilson

M.H. Detrick

*Daniel Ruell, 3351 East Morristown Road, Lake City, MI 49651
(616) 229-4223

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Bond Supply; Alexander Stafford; Acme Insulations;
Evert Asbestos; Duro Supply

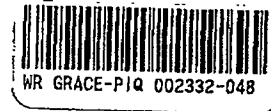
Products:Manufacturers:

(*) Denotes Plaintiff in an asbestos lawsuit.



Kaylo pipecovering and block Owens-Corning Fiberglas
Calsilite pipecovering and
block Ruberoid (GAF)

(*) Denotes Plaintiff in an asbestos lawsuit.



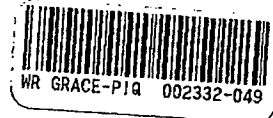
<u>Products:</u>	<u>Manufacturers:</u>
Thermobestos pipecovering and block	Johns-Manville
352 cement	Johns-Manville
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
Super 66 cement	Eagle Picher
7M-90 cement	Philip Carey
(Celotex/Rapid-	
Zonolite insulation	American)
Insulating cement	W.R. Grace
Asbestos paper	A.P. Green
Insulating cement	Grant Wilson
Insulating cement	Grant Wilson
	M.H. Detrick

*Wayne Terberg, 209 Meadows Dr., Augusta, MI (616) 731-4934

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and block	Ruberoid (GAF)
85% Mag pipecovering & block	Armstrong Cork (Armstrong World Industries)
85% Mag pipecovering, block and cements	Johns-Manville
Thermobestos pipecovering and block	Johns-Manville
352 cement	Johns-Manville
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
85% Mag pipecovering, block and cement	Pabco (Fibreboard)
Super 66 cement	Eagle Picher
85% Mag pipecovering, block and cements	Philip Carey
(Celotex/Rapid-	
7M-90 cement	American)
	Philip Carey

(*) Denotes Plaintiff in an asbestos lawsuit.



(Celotex/Rapid-

Zonolite insulation
 Insulating cement
Products:

American)
 W.R. Grace
 A.P. Green
Manufacturers:

Insulating cement
 Joint compounds
 Joint compounds

M.H. Detrick
 U.S. Gypsum
 Gold Bond (National Gypsum)

*Edward Ruell, 4932 Lawrence Road, Route 3, Nashville, MI 49073
 (517) 852-9821

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
 SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
 MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
 PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
 FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

Products:Manufacturers:

Kaylo pipecovering and block
 Kaylo pipecovering and block
 Calsilite pipecovering and
 block

Owens-Illinois
 Owens-Corning Fiberglas

Ruberoid (GAF)

85% Mag pipecovering & block

Armstrong Cork (Armstrong
 World Industries)

85% Mag pipecovering, block
 and cements

Johns-Manville

Thermobestos pipecovering and
 block

Johns-Manville

352 cement

Johns-Manville

No. 1 Plus cement

Baldwin-Ehret-Hill (Keene)

85% Mag pipecovering, block
 and cements

Mundet Cork (Crown Cork &
 Seal)

85% Mag pipecovering, block
 and cement

Pabco (Fibreboard)

Super 66 cement

Eagle Picher

85% Mag pipecovering, block
 and cements

Philip

Carey

(Celotex/Rapid-

7M-90 cement

American)

Philip

Carey

(Celotex/Rapid-

Zonolite insulation
 Insulating cement
 Insulating cement

American)

W.R. Grace

A.P. Green

M.H. Detrick

(*) Denotes Plaintiff in an asbestos lawsuit.



Joint compounds
Joint compounds

U.S. Gypsum
Gold Bond (National Gypsum)

(*) Denotes Plaintiff in an asbestos lawsuit.



*Jack Wilson, 53682 Flatbush Rd., Marcellus, MI 49067 (616)
279-
5914

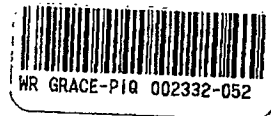
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and block	Ruberoid (GAF)
85% Mag pipecovering & block	Armstrong Cork (Armstrong World Industries)
85% Mag pipecovering, block and cements	Johns-Manville
Thermobestos pipecovering and block	Johns-Manville
352 cement	Johns-Manville
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
85% Mag pipecovering, block and cement	Pabco (Fibreboard)
Super 66 cement	Eagle Picher
85% Mag pipecovering, block and cements	Philip Carey
(Celotex/Rapid-	American)
7M-90 cement	Philip Carey
(Celotex/Rapid-	American)
Zonolite insulation	W.R. Grace
Insulating cement	A.P. Green
Insulating cement	M.H. Detrick
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)

*Leon Norris, O-6325 8th Ave., Grandville, MI 49418 (616)
457-9107

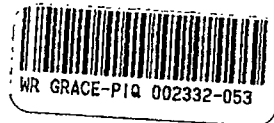
<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block	Owens-Illinois

(*) Denotes Plaintiff in an asbestos lawsuit.



Kaylo pipecovering and block Owens-Corning Fiberglas
Calsilite pipecovering and
block Ruberoid (GAF)

(*) Denotes Plaintiff in an asbestos lawsuit.



<u>Products:</u>	<u>Manufacturers:</u>
85% Mag pipecovering & block	Armstrong Cork (Armstrong World Industries)
85% Mag pipecovering, block and cements	Johns-Manville
Thermobestos pipecovering and block	Johns-Manville
352 cement	Johns-Manville
No. 1 Plus cement	Baldwin-Ehret-Hill (Keene)
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
85% Mag pipecovering, block and cement	Pabco (Fibreboard)
Super 66 cement	Eagle Picher
85% Mag pipecovering, block and cements	Philip Carey
(Celotex/Rapid-	American)
7M-90 cement	Philip Carey
(Celotex/Rapid-	American)
Zonolite insulation	W.R. Grace
Insulating cement	A.P. Green
Insulating cement	M.H. Detrick
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)

William Wells, 9717 4 Mile Road, Plainwell, MI 49080

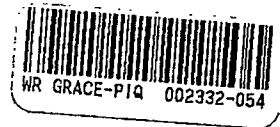
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Bond Supply; Harrison Piping; Duro Supply

<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block	Owens-Corning Fiberglas
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets	

(*) Denotes Plaintiff in an asbestos lawsuit.

and packing
Oakum 310 and 310A

Durabla
Sealite



*John Irwin, P.O. Box 552, Rockford, MI 49341

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Bond Supply; Harrison Piping; Duro Supply; Hi-Temp
(Asbestos Specialties)

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets and packing	Durabla
Oakum 310 and 310A	Sealite

*William Collick, 51805 Finch Road, Marcellus, MI 49067 (616)
646-9834

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Bond Supply; Harrison Piping; Duro Supply; Hi-Temp
(Asbestos Specialties)

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets	

(*) Denotes Plaintiff in an asbestos lawsuit.



and packing
Asbestos containing gaskets
and packing
Oakum 310 and 310A

Palmetto (Green Tweed)
Durabla
Sealite

JOB NUMBER: 2

PERIOD WORKED: Early-Mid 1960s

JOB SITE AND LOCATION: Ferris State College, Big Rapids, Michigan

EMPLOYER: John B. Rossi Co.

LENGTH OF EXPOSURE: 4-6 months

Plaintiff's investigation to date has identified the following products as having been used significantly on this job:

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

Products:

Manufacturers:

Kaylo pipecovering and block
7M-90 cement
(Celotex/Rapid-

Owens-Corning Fiberglas
Philip Carey

Joint compounds

American)

Joint compounds

U.S. Gypsum

Asbestos containing gaskets

Gold Bond (National Gypsum)

and packing

Garlock

Asbestos containing gaskets

and packing

Anchor Packing

Asbestos containing gaskets

and packing

Palmetto (Green Tweed)

Zonolite insulation

W.R. Grace

Initial contacts with witnesses leads Plaintiff to believe that the following witnesses will be able to identify at least the following products. Further, it is anticipated that the following witnesses will also testify relative to the presence of distributors/contractors and/or jobbers as identified above although, unless noted, the witnesses have not been interviewed regarding distributors/jobbers and/or contractors:

(*) Denotes Plaintiff in an asbestos lawsuit.



*Alvin W. Malone, 807 Merry Lane Terrace, Greenville, MI 48838
616-754-5459

<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block 7M-90 cement (Celotex/Rapid-	Owens-Corning Fiberglas Philip Carey American)
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Zonolite insulation	W.R. Grace

*Gary Aldrich, 407 West Jenny, Bay City, MI 48706 517-894-7921

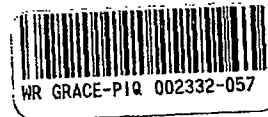
CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
85% Mag pipecovering, block and cements (Celotex/Rapid-	Philip Carey American)
85% Mag pipecovering, block and cements	Johns-Manville
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
Insulating cement	North American Refractories
Asbestos block insulation	Plibrico
Insulating cement	Plibrico
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)

(*) Denotes Plaintiff in an asbestos lawsuit.

Asbestos containing gaskets
and packing
Zonolite insulation

Durabla
W.R. Grace



*Willis McWilliams, 1922 4 Mile Road, N.W., Grand Rapids, MI
48504 (616) 784-0536

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
85% Mag pipecovering, block and cements	Philip Carey
(Celotex/Rapid-	American)
85% Mag pipecovering, block and cements	Johns-Manville
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
Insulating cement	North American Refractories
Asbestos block insulation Plibrico	Plibrico
Insulating cement	Plibrico
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets and packing	Durabla
Zonolite insulation	W.R. Grace

*Bernard McWilliams, 1988 4 Mile Road, N.W., Grand Rapids, MI
49507 (616) 784-0537

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

Products:

Manufacturers:

(*) Denotes Plaintiff in an asbestos lawsuit.



Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
85% Mag pipecovering, block and cements	Philip Carey
(Celotex/Rapid-	
<u>Products:</u>	<u>Manufacturers:</u>
85% Mag pipecovering, block and cements	Johns-Manville
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
Insulating cement	North American Refractories
Asbestos block insulation	Plibrico
Insulating cement	Plibrico
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets and packing	Durabla
Zonolite insulation	W.R. Grace

*Leon Norris, O-6325 8th Ave., Grandville, MI 49418 (616)
457-9107

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Alexander Stafford; Acme Insulations; Evert Asbestos

<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block	Owens-Illinois
Kaylo pipecovering and block	Owens-Corning Fiberglas
85% Mag pipecovering, block and cements	Philip Carey
(Celotex/Rapid-	
85% Mag pipecovering, block and cements	American)
85% Mag pipecovering, block and cements	Johns-Manville
Insulating cement	Mundet Cork (Crown Cork & Seal)
Asbestos block insulation	North American Refractories
	Plibrico

(*) Denotes Plaintiff in an asbestos lawsuit.

Insulating cement
Asbestos containing gaskets
and packing
Asbestos containing gaskets
and packing
Asbestos containing gaskets
and packing
Asbestos containing gaskets
and packing
Zonolite insulation

Plibrico

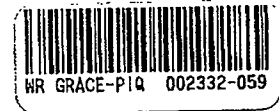
Garlock

Anchor Packing

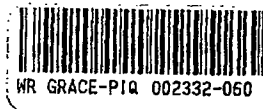
Palmetto (Green Tweed)

Durabla

W.R. Grace



(*) Denotes Plaintiff in an asbestos lawsuit.



JOB NUMBER: 3

PERIOD WORKED: Early 1960s - 1972

JOB SITE AND LOCATION: Various commercial jobs including:
Schools, Churches,

Hospitals in the Saginaw, Bay City

and Essexville, MI area

EMPLOYER: John B. Rossi

LENGTH OF EXPOSURE: Approximately 1 years

Plaintiff's investigation to date has identified the following products as having been used significantly on this job:

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Hollinger &
Co.; Bay City Hardware; Jennison Hardware; Harrison Piping;
Asbestos Specialties (Hi-Temp Products); Duro Supply

<u>Products:</u>	<u>Manufacturers:</u>
Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
85% Mag pipecovering, block and cement	Keasbey & Mattison/Turner & Newall
85% Mag pipecovering, block and cements	Mundet Cork (Crown Cork & Seal)
Thermobestos pipecovering and block	Johns-Manville
352 cement	Johns-Manville
Careytemp pipecovering and block	Philip Carey (Celotex/Rapid- American)
7M-90 cement (Celotex/Rapid-	Philip Carey
Asbestos block insulation M.H.	American)
Insulating cement	Detrick
Stic-tite cement	M.H. Detrick
Insulating cement	Combustion Engineering
Insulating cements	A.P. Green
Refractories)	GREFCO (General
Insulating cement	Grant Wilson
Asbestos refractory cement	Rutland Fireclay
Kilnoise accoustical plaster	Basic Inc.
Kilnoise accoustical plaster	Pfizer
Accoustical plaster	U.S. Gypsum
Joint compounds	U.S. Gypsum
Accoustical plaster	Gold Bond (National Gypsum)

(*) Denotes Plaintiff in an asbestos lawsuit.

Products:Manufacturers:

Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets and packing	Palmetto (Green Tweed)
Asbestos containing gaskets and packing	Durabla
Zonolite insulation	W.R. Grace
Monokote fireproofing	W.R. Grace
Accoustical plaster	W.R. Grace
Cafco sprayed asbestos	U.S. Mineral Products

Initial contacts with witnesses leads Plaintiff to believe that the following witnesses will be able to identify at least the following products. Further, it is anticipated that the following witnesses will also testify relative to the presence of distributors/contractors and/or jobbers as identified above although, unless noted, the witnesses have not been interviewed regarding distributors/jobbers and/or contractors:

REDACTED

Will confirm exposures to those above identified asbestos-containing products.

*Richard Gage, 22580 Marion Rd., Brant, MI 48614

CONTRACTORS/DISTRIBUTORS/JOBBERS PRESENT AT THE JOBSITE SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS, PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR FURNACES: Coon Devisser; Owens-Corning Fiberglas; Hollinger & Co.; Bay City Hardware; Jennison Hardware

Products:Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
7M-90 cement	Philip Carey
(Celotex/Rapid-	American)
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Asbestos containing gaskets and packing	Garlock
Asbestos containing gaskets and packing	Anchor Packing
Asbestos containing gaskets	

(*) Denotes Plaintiff in an asbestos lawsuit.



and packing
Asbestos containing gaskets
and packing
Zonolite insulation

Palmetto (Green Tweed)
Durabla
W.R. Grace

Lloyd Fox, 503 Harvard, Bay City, MI 48706

CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Hollinger &
Co.; Bay City Hardware; Jennison Hardware.

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
7M-90 cement	Philip Carey
(Celotex/Rapid-	
Joint compounds	American)
Joint compounds	U.S. Gypsum
Asbestos containing gaskets	Gold Bond (National Gypsum)
and packing	Garlock
Asbestos containing gaskets	Anchor Packing
and packing	
Asbestos containing gaskets	Palmetto (Green Tweed)
and packing	
Asbestos containing gaskets	Durabla
and packing	W.R. Grace
Zonolite insulation	

*Joseph G. Endstrasser, 312 South Lynn, Bay City, MI 48706
517-893-0150

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
7M-90 cement	Philip Carey
(Celotex/Rapid-	
Insulating cement	American)
Insulating cements	A.P. Green
Refractories)	GREFCO (General
Asbestos refractory cement	Rutland Fireclay
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

Eugene Lauria, 416 Pinconning Rd., Pinconning, MI 48650

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
7M-90 cement	Philip Carey

(*) Denotes Plaintiff in an asbestos lawsuit.



(Celotex/Rapid-

Insulating cement
 Insulating cements
 Refractories)

Asbestos refractory cement Rutland Fireclay
 Joint compounds U.S. Gypsum
 Joint compounds Gold Bond (National Gypsum)
 Zonolite insulation W.R. Grace

American)
 A.P. Green
 GREFCO

(General

*Niel A. Detloff, Sr., 1799 South River Road, Midland, MI 48640
 517-835-6515

Products:Manufacturers:

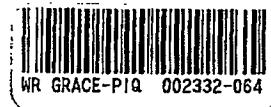
Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos block insulation M.H.	Detrick
Insulating cement	M.H. Detrick
Stic-tite cement	Combustion Engineering
Insulating cement	A.P. Green
Insulating cements	GREFCO (General
Refractories)	
Asbestos refractory cement	Rutland Fireclay
Kilnoise accoustical plaster	Basic Inc.
Kilnoise accoustical plaster	Pfizer
Accoustical plaster	U.S. Gypsum
Joint compounds	U.S. Gypsum
Accoustical plaster	Gold Bond (National Gypsum)
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace
Monokote fireproofing	W.R. Grace
Accoustical plaster	W.R. Grace
Cafco sprayed asbestos	U.S. Mineral Products

*Albert L. Hildebrandt, 3140 North Thomas, Freeland, MI 48623
 517-781-1211

Products:Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Asbestos block insulation M.H.	Detrick
Insulating cement	M.H. Detrick
Stic-tite cement	Combustion Engineering
Insulating cement	A.P. Green
Insulating cements	GREFCO (General
Refractories)	
Asbestos refractory cement	Rutland Fireclay
Kilnoise accoustical plaster	Basic Inc.
Kilnoise accoustical plaster	Pfizer
Accoustical plaster	U.S. Gypsum
Joint compounds	U.S. Gypsum
Accoustical plaster	Gold Bond (National Gypsum)
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

(*) Denotes Plaintiff in an asbestos lawsuit.



Monokote fireproofing
Accoustical plaster
Cafco sprayed asbestos

W.R. Grace
W.R. Grace
U.S. Mineral Products

*Leo E. Smith, 4450 Stello Road, Saginaw, MI 48609 517-865-9488

Products:

Monokote fireproofing
Accoustical plaster
Cafco sprayed asbestos
Kaylo pipecovering and block

Products:

Kilnoise accoustical plaster
Kilnoise accoustical plaster
Accoustical plaster
Accoustical plaster

Manufacturers:

W.R. Grace
W.R. Grace
U.S. Mineral Products
Owens-Corning Fiberglas

Manufacturers:

Basic Inc.
Pfizer
U.S. Gypsum
Gold Bond (National Gypsum)

*Emery L. Chartier, 539 Dodson Court, BayCity, MI 48708 (517)
893-4390

Products:

Monokote fireproofing
Accoustical plaster
Cafco sprayed asbestos
Kaylo pipecovering and block
Kilnoise accoustical plaster
Kilnoise accoustical plaster
Accoustical plaster
Accoustical plaster

Manufacturers:

W.R. Grace
W.R. Grace
U.S. Mineral Products
Owens-Corning Fiberglas
Basic Inc.
Pfizer
U.S. Gypsum
Gold Bond (National Gypsum)

*Howard V. Sova, 809 Caravelle, Saginaw, MI 48604 (517)
755-4965

Products:

Monokote fireproofing
Accoustical plaster
Cafco sprayed asbestos
Kaylo pipecovering and block
Kilnoise accoustical plaster
Kilnoise accoustical plaster
Accoustical plaster
Accoustical plaster

Manufacturers:

W.R. Grace
W.R. Grace
U.S. Mineral Products
Owens-Corning Fiberglas
Basic Inc.
Pfizer
U.S. Gypsum
Gold Bond (National Gypsum)

*Eugene Thomas, 4000 Harold #113, Saginaw, MI 48601 (517)
752-7627

Products:

Monokote fireproofing
Accoustical plaster
Cafco sprayed asbestos

Manufacturers:

W.R. Grace
W.R. Grace
U.S. Mineral Products

(*) Denotes Plaintiff in an asbestos lawsuit.



Kaylo pipecovering and block
Kilnoise accoustical plaster
Kilnoise accoustical plaster
Accoustical plaster
Accoustical plaster

Owens-Corning Fiberglas
Basic Inc.
Pfizer
U.S. Gypsum
Gold Bond (National Gypsum)

(*) Denotes Plaintiff in an asbestos lawsuit.

*William R. Glass, P.O. Box 2211, Port Charlotte,
(813) 627-4363



CONTRACTORS/DISTRIBUTORS/JOBBER PRESENT AT THE JOBSITE
SUPPLYING AND/OR INSTALLING ASBESTOS CONTAINING INSULATION
MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Bay City
Hardware; Jennison Hardware; Duro Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and	
block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
85% Mag pipecovering, block	
and cement	Keasbey & Mattison/Turner &
	Newall
Careytemp pipecovering and	
block	Philip Carey (Celotex/Rapid-
	American)
7M-90 cement	Philip
(Celotex/Rapid-	Carey
	American)
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

*Gerald H. Duquette, 4877 Simpson Road, Owosso, MI 48867
517-725-9033

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Thermobestos pipecovering and	
block	Johns-Manville
352 cement	Johns-Manville
7M-90 cement	Philip
(Celotex/Rapid-	Carey
	American)
Joint compounds	U.S. Gypsum
Joint compounds	Gold Bond (National Gypsum)
Zonolite insulation	W.R. Grace

(*) Denotes Plaintiff in an asbestos lawsuit.

*Robert Abbs, 312 North Trumbull, Bay City, MI 4876345



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MATERIALS SUCH AS BLOCK, PIPECOVERING, CEMENTS, GASKETS,
PACKING, TAPE, WICK AND/OR ASBESTOS WRAPPED/LINED BOILERS FOR
FURNACES: Coon Devisser; Owens-Corning Fiberglas; Bay City
Hardware; Jennison Hardware; Duro Supply

Products:

Manufacturers:

Kaylo pipecovering and block	Owens-Corning Fiberglas
Calsilite pipecovering and block	Ruberoid (GAF)
7M cement	Ruberoid (GAF)
85% Mag pipecovering, block and cement	Keasbey & Mattison/Turner & Newall
Careytemp pipecovering and block	Philip Carey (Celotex/Rapid- American)
7M-90 cement (Celotex/Rapid-	Philip Carey
Joint compounds	American)
Joint compounds	U.S. Gypsum
Zonolite insulation	Gold Bond (National Gypsum) W.R. Grace

*Robert Salois, 5439 Baxman Rd., Bay City, MI 48706 (517)
786-0020

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7M-90 cement (Celotex/Rapid-	Philip Carey
Joint compounds	American)
	U.S. Gypsum

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